CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

January 8, 2003

Mr. Jeff Hansen
CE Obsidian Energy, LLC
302 South 36th Street, Suite 400
Omaha, Nebraska 68131-3845

RE: SALTON SEA UNIT #6 PROJECT (02-AFC-2) DATA REQUESTS

Dear Mr. Hansen:

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission (Energy Commission) staff requests that CE Obsidian Energy, LLC supply the information specified in the enclosed data requests.

The subject areas addressed in the enclosed 33 data requests (107 through 139) are air quality, biological resources, land use, traffic and transportation, and visual resources.

These data requests are supplemental to those previously submitted and are based upon site visits, discussions with other agency staff, and additional review of information provided by the applicant.

The information requested is necessary to understand the project, assess whether the project will result in significant environmental effects and conform with applicable laws, ordinances, regulations and standards, and to assess project alternatives and mitigation measures.

Written responses to the enclosed data requests are due to the Energy Commission by February 7, 2003, or at a later date agreed upon by the Energy Commission staff.

If you are unable to provide the information requested, or object to providing it, you must notify Chairman William J. Keese, Presiding Member the committee assigned to the project and myself, within 10 days of receiving these requests, stating your reason for delay or objection.

If you have any questions regarding the enclosed data requests, please call me at (916) 651-8853.

Sincerely,

Robert Worl
Siting Project Manager

Enclosure

cc: POS List
Agency Distribution List

Technical Area: Air Quality
Authors: William Walters

BACKGROUND

Exhaust Gas Chemistry

The Application for Certification (AFC) provides a list of chemical constituents that are anticipated in the proposed facility gas exhaust streams. Staff needs additional information to understand the exhaust constituents and to make sure that the identification of chemical constituents in the proposed facility gas exhaust streams is complete. This information will be valuable in preparing a complete analysis of potential impacts for air quality and public health. The following data requests are provided to obtain more specific information than that provided in response to Public Health Data Request #54.

107. Please confirm that arsine is the chemical form, or the assumed chemical form, of the non-condensable arsenic identified in various sections of the AFC.

108. Please identify if there will be emission of, or the potential for emission of, periodic table Group V and VI hydrides other than hydrogen sulfide, ammonia, and arsine (e.g. hydrogen selenide), and if so please estimate their emissions.

109. The chemical constituents identified by the AFC in the water and gas streams do not mention phosphorus compounds in any form. Please state whether there will be phosphorus compound emissions, and if so identify the potential chemical forms and estimate their emissions.

110. Please state whether any volatile halogenated compounds, organic or inorganic, will be emitted from the proposed facility, and if so please estimate their emissions.

111. Please state whether reduced sulfur compounds, other than hydrogen sulfide, will be emitted from the proposed facility, and if so please estimate their emissions.

112. Please estimate the methane emissions from the proposed facility.

113. Please provide the total volatile organic compound mass emissions for the cooling tower and dilution water heaters; and provide mass emissions for each expected organic component of the total organic compound mass emissions.

BACKGROUND

Hydrochloric Acid Tank

The AFC indicates that there will be a 32,000 gallon 32% hydrochloric acid tank. The vapor pressure of 32% hydrochloric acid is approximately 81 mmHg at 104°F. Staff needs additional information regarding this tank, its emission controls, and its estimated emissions.

114. Please identify the emission controls that will be used to control hydrochloric acid emissions from the 32% hydrochloric acid tank, and please provide maximum loading event, maximum daily, and maximum annual emission estimates for the 32% hydrochloric acid tank.

BACKGROUND

Dilution Water Heaters

The applicant has provided emissions for the dilution water heaters assuming that they are always in use, but the AFC notes that they might not always be in use. Staff needs additional information to address any additional emissions that may occur if the dilution water heaters are bypassed.

115. Please provide the location of the emission exhaust points, emission exhaust parameters (temperature, velocity, stack height and diameter, moisture content), and an emission estimate for all criteria and toxic air pollutants that would occur when the dilution water heaters are not in use.

116. Please identify the conditions when the dilution water heaters are bypassed or otherwise not in operation and estimate the number of hours per year that this is likely to occur.

Technical Area: Biological Resources
Author: Natasha Nelson
Technical Senior: Jim Brownell

BACKGROUND

The applicant's proposed electrical transmission line routes cross an estimated 27 miles of agricultural lands and 2.8 miles of undeveloped Bureau of Land Management (BLM) land. The proposed routes are along paved and unpaved roads that in general contain other distribution and transmission lines within their shoulders.

The routes cross both the New River and the Alamo River, but no other large water bodies have been identified. Brown pelicans have been confirmed by the California Department of Fish and Game as using the Salton Sea and aquaculture (fish) farms in the County. However, staff cannot find information on aquaculture (fish) farms in the AFC.

DATA REQUEST

117. The transmission line route crosses Alamo River at Hoober Road. This location does not contain a bridge, nor any overhead utilities. Provide an explanation of why this location was chosen instead of Sinclair Road (approximately 2000 feet north) which does have a bridge and overhead utilities. Provide an analysis of how increasing the density of overhead lines may increase threats to the many shorebirds, gulls, and herons found during applicant's surveys.

118. Based on the analysis of potential impacts to shorebirds, gulls, and herons, describe if there are any design limitations to either placing the route on Sinclair Road (between English and Kalin Road) or underground for the Alamo River crossing.

119. Describe whether the transmission line route within BLM land is adjacent to the existing paved road that leads to the active landfill. If the route is only partially on this road, describe at what point it diverts.

120. Provide a list of all aquaculture (fish) farms, and their addresses, which are within one mile of the proposed transmission line routes or the power plant site.

BACKGROUND

The "L-line Interconnection" crosses Bureau of Land Management land for 2.8 miles. While the AFC presented information on the flat-tailed horned lizard, the Biological Assessment did not contain an analysis of potential impacts of transmission line construction on this species. During a meeting with the BLM on November 14, 2002, Bureau staff indicated that this species may need to be covered under their consultation with the U.S. Fish and Wildlife Service.

121. Provide an overview of flat-tailed horned lizard biology and occurrences in a manner consistent with the treatment of federally listed species in the Biological Assessment prepared for CE Obsidian Energy LLC by URS on July 11, 2002. Include a determination of "effect" as defined by the U.S. Fish and Wildlife Service for federally listed species.

122. Provide the current regulatory status of the flat-tailed horned lizard and the date of any anticipated filings by the U.S. Fish and Wildlife Service on this species.

BACKGROUND

The applicant's proposed transmission line route would connect to the L-Line 2.8 miles west of State Highway 86. In November 2002, the applicant indicated to staff that they may propose a Bannister Substation on the west side of State Highway 86 on Imperial Irrigation District lands. The applicant is requesting concurrent review of an alternative interconnection to the L-Line which does not cross Bureau of Land Management Land (see Section 6.2.2 of the AFC). The alternative L-line interconnection would route north along State Highway 86 for approximately 7.5 miles to the intersection of State Highway 86 and the L-Line (note, the application is unclear as to which shoulder of State Route 86 would be used). Staff does not have adequate information on how the proposed Bannister Substation could be incorporated into the alternative L-line interconnection proposal.

DATA REQUEST

123. Please describe how the proposed alternative L-line interconnection would connect to the proposed Bannister Substation on the west side of State Route 86. If instead, a substation at a new location would be used in conjunction with the longer alternate route, please describe the new location and include a recent aerial photo of the site. Selection of substation sites that are not in active agricultural production will require a biological report which includes vegetation types and the potential for federal- or state-listed species to be present.

Technical Area: Land Use
Author: David Flores

BACKGROUND

The applicant has stated (AFC page 5.8-3) that the proposed geothermal power plant project is within a Heavy Agricultural, Geothermal Overlay Zone (A-3-G) in which both are permitted uses subject to the requirements of a conditional use permit or its equivalent for new facilities.

In accordance with the Warren-Alquist Act (Section 25525) the project must conform with local zoning ordinances. The Warren-Alquist Act imposes a general "conformity" requirement that a proposed new or modified energy facility meet the local government's zoning standards in order to grant it a license to operate. Commission staff will work with the County of Imperial to insure that conditional use permit (CUP) conditions are implemented.

DATA REQUEST

124. Please list the required Imperial County conditional use permits and demonstrate in writing that the proposed facility will be in conformance with each in accordance with their zoning regulations. A Land Use Permit, a Development Permit, and setback requirements at are three such areas.

BACKGROUND

The applicant has further stated that the transmission line interconnection proposed on BLM land must meet the requirements of the California Desert Conservation Area plan (CDCA). To comply with the CDCA plan, an amendment involving designation of a new utility corridor will be required. A BLM right-of-way grant would also be required for that portion of the transmission line.

DATA REQUEST

125. Please provide in writing the proposed schedule and status for obtaining the right-of-way grant and amendment to the CDCA plan from the Bureau of Land Management.

BACKGROUND

The County of Imperial Sign Ordinance governs the size, location, and type of signs permitted on the project site. The AFC provides no indication of the signs proposed by the applicant. It is not possible to determine compliance with the County Sign Ordinance from existing data submitted.

DATA REQUEST

126. Provide a sign program that includes the following:

    a. The location, size and number of all signs proposed;

    b. The materials that will be used to construct the signs;

    c. The lighting technique that will be used for the signs;

    d. The installed height and dimensions of the signs;

    e. The type of signs to be used (for example, a monument sign or a building mounted sign);

    f. If signs will be located on buildings, identify the distance from the surface of the sign to the surface of the structure to which it will be attached;

    g. An architectural rendering of all signs proposed; and

    h. The content of each sign proposed.

BACKGROUND

The County of Imperial Zoning Code restricts lot coverage in the Heavy Agricultural, Geothermal Overlay Zone that includes the project site. The site plan does not provide calculations of the site area and the aerial extent of proposed roofed structures. This data is required to evaluate project compliance with zone lot coverage requirements.

DATA REQUEST

127. Provide calculations to show the project's consistency with the County of Imperial's Heavy Agricultural, Geothermal Overlay Zone lot coverage standards with respect to:

    a. the aerial extent of the project site (i.e. the entire ultimate legal parcels proposed for development) in square feet; and

    b. the aerial extent of proposed and existing structures with roofs in square feet to show consistency with County of Imperial lot coverage standards.

Technical Area: Traffic and Transportation
Author: Ken Peterson

BACKGROUND

The AFC states that a rail switchyard to the east of State Highway 111 (SH-111) at Sinclair Road would be used as the unloading point for project heavy equipment and machinery transported by rail line (p. 5.10-7). The equipment and machinery would be transported from this point on Sinclair Road across SH-111. Staff has concluded upon review that use of this unloading point may require use of private land.

DATA REQUEST

128. Please submit an explanation of safety measures necessary for the transport of heavy equipment and machinery across SH-111.

129. Please provide information on ownership, leasing arrangements, and any other information necessary to demonstrate site control by the applicant for any private land to be used as part of the rail line unloading point.

BACKGROUND

The two transmission line routes will cross several roads and construction could disrupt traffic. Temporary staging areas would be used when construction areas are at locations that are distant from the plant site. The AFC states that traffic crossing-related delays and conflicts could occur at or near the entrance of the proposed access road connecting the laydown area to Boyle Road (p. 5.10-11).

DATA REQUEST

130. Please discuss the proposed mitigation for safety and traffic obstruction concerns during construction at transmission line road crossings and on Boyle Road at or near the access road entrance.

131. Please describe construction worker parking facilities when transmission line temporary staging areas are to be used.

BACKGROUND

McKendry Road and Boyle Road would be used for project construction truck traffic. Both of these roads are unpaved in the vicinity of the project. The AFC states that access to the laydown area would be by a road to be constructed from Boyle Road along the middle of the parcel between McKendry Road and Peterson Road (p. 5.10-5).

DATA REQUEST

132. Please discuss improvements necessary for McKendry and Boyle Roads, and any other road improvements necessary for project construction and operation.

133. Please describe project road improvements that would be required by the Imperial County Zoning Ordinance and project building permit conditions.

BACKGROUND

The Commission staff needs to evaluate the construction and operation period routes that would be taken by hazardous materials supply and waste removal trucks.

DATA REQUEST

134. Please describe the construction and operation period routes that would be taken by hazardous materials supply and waste removal trucks.

Technical Area: Visual Resources
Author: James Adams

BACKGROUND

Staff has identified the need for the establishment of three new key observation points and additional current and photo-simulations. These will be used to determine if there could be any significant visual impacts on local residents, travelers, or visitors to the Sonny Bono Salton Sea National Wildlife Refuge.

Well over 10,000 people visit the Salton Sea Refuge Complex each year. The project would be visible from the top of Rock Hill and staff needs to consider the amount of the view disruption caused by the project plumes from this public observation area.

DATA REQUEST

135. Please provide a high-quality 11” by 17” color photo-simulation, at life-size scale, from a location 200 yards south of the SR-111 point of intersection with the proposed Imperial Irrigation District (IID) Midway interconnection line. Also provide a current view without the proposed lines at the same size and scale.

136. Please provide a high-quality 11” by 17” color photo-simulation, at life-size scale, from a location 200 yards east of the SR-111 point of intersection with the proposed IID interconnection line proceeding to the L-line interconnection. Also provide a current view without the proposed lines at the same size and scale.

137. Please provide a high-quality 11” by 17” color photo-simulation, 180-degree panoramic view with the proposed project at center, during average winter meteorological conditions from the public viewing area at the top of Rock Hill. Also provide a current view at the same size and scale.

138. Please provide a revised Visual Sphere of Influence Figure 5.12-1(from the AFC) showing the new key observation points.

139. Please provide high-resolution electronic versions (PDF format acceptable)on a CD of all figures presented in the visual section of the AFC, and the figures prepared in response to these data requests.